

OBSERVATION REPORT #100

Verizon does not provide sufficient documentation on a migration from ISDN-PRI service to a CLEC UNE-EEL DS1 Loop.

Issue

KPMG Consulting submitted an order, LSR PON 097051NN0X010004*AC with related ASR PONs 97051M4A and 97051M4Z, to migrate a Verizon-NJ DS1 customer with ISDN-PRI service to CLEC UNE-EEL DS1 Loop without LNP. KPMG Consulting received an error message and was told by a Verizon-NJ representative that a customer with ISDN-PRI service cannot be converted to a regular DS1 loop via this process of combined LSR and ASRs.

The Verizon Order Business Rules, version 4.5.1,¹ state that in Bell Atlantic South, migrations of DS1 and DS3 loops (including EEL and M-Loops) must be ordered as a disconnect on the LSR and a new connect on the ASR. However, a notice issued by BA Change Control on 12/26/00 states that migrations from a DID or ISDN-PRI to a DS1/3 UNE Loop are all accomplished on the LSR. No further documentation on migrations from ISDN-PRI to UNE-EEL DS1 Loops is provided.

Assessment

The loop facilities that allow a customer to obtain ISDN-PRI service essentially have the same physical make-up as the facility that provides DS1 service. There may instances in a commercial environment where a CLEC wins a retail PRI customer from Verizon and wishes to provide service to that customer using an EEL arrangement. Verizon-NJ's inability to provide the proper documentation to successfully complete orders may inhibit a CLEC's ability to provide this type of service to its customers.

¹ Verizon South Order Business Rules, version 4.5.1, Publication date January 2001, Release date February 2001.

This observation report is for discussion purposes only and is subject to change without notice.